

# McNamee, Lochner, Titus & Williams, P.C.

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August 3, 2015

*Via ECF*

Hon. Christian F. Hummel  
United States Magistrate Judge  
United States District Court  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, New York 12207-2936

**Re: National Life Insurance Company v. Gomez et al.  
Case 1:15-CV-00439 (MAD/CFH)**

Dear Judge Hummel:

This office represents interpleader plaintiff National Life Insurance Company ("National Life") in this interpleader action brought to determine to which individual(s) the proceeds of a life insurance policy on the late Jane H. Gomez should be paid.

I am writing to follow up my letter to Your Honor of July 13, 2015, specifically to advise that, since the time of that letter, I have been in contact with counsel for both the new guardian for the infant interpleader defendants (Rosanna Vargas and Donald David of Akerman, LLP in New York City) and for the interpleader defendant Robert Gomez. They advise that, upon National Life's service of its answer to Robert Gomez' present counterclaim, he intends to serve an amended answer with an amended counterclaim (against National Life) and a new cross-claim (against the infant interpleader defendants). In these circumstances counsel for the new guardian for the infant interpleader defendants has requested, and I have granted, an extension of time until 20 days after the service of Robert Gomez's amended answer with cross-claim within which to answer National Life's interpleader complaint. In these circumstances I have requested, and counsel for Robert Gomez has granted, National Life a 10 day extension, until August 13, to serve its answer to his present counterclaim.

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United States Magistrate Judge  
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In these circumstances, I also respectfully request that the Court consider adjourning the conference presently set for September 9 so that the pleadings will be complete by the time that conference is conducted.

Respectfully submitted,

McNAMEE, LOCHNER, TITUS & WILLIAMS, P.C.



G. Kimball Williams

GKW/tjd

cc: Kenneth V. Gomez, Esq. (via ECF)

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